

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SAWABEH INFORMATION SERVICES
COMPANY and EDCOMM, INC.,

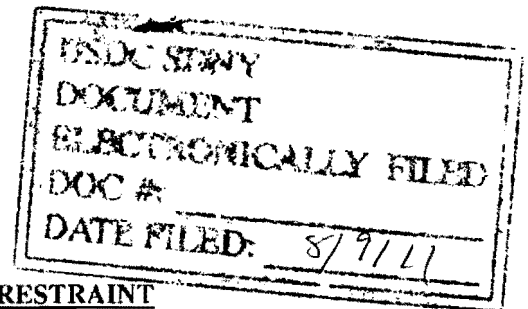
Plaintiffs,

v.

CLIFFORD BRODY, LINDA EAGLE and
DAVID SHAPP,

Defendants.
-----X

Case No.: 11 CV 4164 (SS) (SAS)



**STIPULATION AND CONSENT TEMPORARY RESTRAINT
AND EXTENSION OF TIME TO RESPOND**

WHEREAS, Plaintiffs Sawabeh Information Services Company and Edcomm, Inc. ("Plaintiffs"), by and through their attorneys, Buchanan Ingersoll & Rooney PC, moved this Court, pursuant to Rule 65 of the Federal Rules of Civil Procedure, for an Order: (1) prohibiting Defendants, during the pendency of this action, from: (a) using Edcomm, Inc.'s intellectual property ("Edcomm's IP") for any purpose whatsoever; (b) making Edcomm, Inc.'s IP available to any other person; (c) assigning, selling, licensing, transferring or otherwise alienating or encumbering Edcomm, Inc.'s IP; and (d) competing with Edcomm, Inc. utilizing Edcomm, Inc.'s IP; and, (2) requiring Defendants to return to Edcomm, Inc. all of Edcomm, Inc.'s IP in their possession, custody or control within three (3) business days from the date of this Order;

WHEREAS, in support of their application for a Preliminary Injunction, Plaintiffs submitted the declarations of Philip L. Hirschhorn, dated July 25, 2011, Haitham Saeed, dated July 21, 2011, Sandi Morgan, dated July 25, Scott Edwards, dated July 21, 2011, and all of the

exhibit(s) attached thereto, and the accompanying Memorandum of Law in Support of Preliminary Injunction, and the pleadings herein; and

WHEREAS, Defendants Clifford Brody, Linda Eagle and David Shapp have requested Plaintiffs' consent to extend the schedule in this Action to permit the parties to discuss settlement of the issues raised therein (the "Settlement Period"),

DEFENDANTS HEREBY AGREE that they shall not, during the pendency of this motion for preliminary injunction and during said Settlement Period, whichever is longer: (a) use Edcomm, Inc.'s IP, including trade secrets and/or confidential information, for any purpose whatsoever; (b) make Edcomm, Inc.'s IP, available to any other person; (c) assign, sell, license, transfer or otherwise alienate or encumber Edcomm, Inc.'s IP; (d) claim ownership of any of Edcomm's IP; and (e) compete with Edcomm, Inc. utilizing Edcomm, Inc.'s IP.

THE PARTIES FURTHER AGREE that the Defendants' time to respond to Plaintiffs' Complaint is extended for 21 days to August 26, 2011. This is the second request for such an extension and is provided to assist in settlement discussions.

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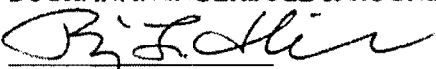
THE PARTIES HEREBY AGREE that this stipulation and consent temporary restraint may be executed by signatures exchanged through facsimile or pdf. scan and/or in counterparts, which, together, shall constitute an original.

Dated: New York, New York
August 5, 2011

SHER LLP

By: Justin M. Sher
41 Madison Avenue,
41st Floor
New York, NY 10010
Tel: 212-202-2600
fax: 212-202-4156
justin.sher@sherllp.com
*Attorneys for Defendants
Clifford Brody, Linda Eagle
and David Shapp*

BUCHANAN INGERSOLL & ROONEY PC


By: Philip L. Hirschhorn
Leslie J. Harris
Tanya D. Bosi
1290 Avenue of the Americas, 30th Floor
New York, New York 10104-3001
Tel.: (212) 440-4400
Fax: (212) 440-4401
philip.hirschhorn@bipc.com
leslie.harris@bipc.com
tanya.bosi@bipc.com

*Attorneys for Plaintiffs Sawabeh Information
Services Company and Edcomm, Inc.*


Agreed and Acknowledged:

Clifford Brody

Linda Eagle

David Shapp

So Ordered:

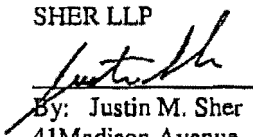

Hon. Shira A. Scheindlin, U.S.D.J.

8/8/11 ⁱⁿ

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fax: 212-202-4156
justin.sher@sherllp.com
*Attorneys for Defendants
Clifford Brody, Linda Eagle
and David Shapp*

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Leslie J. Harris
Tanya D. Bosi
1290 Avenue of the Americas, 30th Floor
New York, New York 10104-3001
Tel.: (212) 440-4400
Fax: (212) 440-4401
philip.hirschhorn@bipc.com
leslie.harris@bipc.com
tanya.bosi@bipc.com

*Attorneys for Plaintiffs Sawabeh Information
Services Company and Edcomm, Inc.*

Agreed and Acknowledged:

Clifford Brody

Linda Eagle

David Shapp

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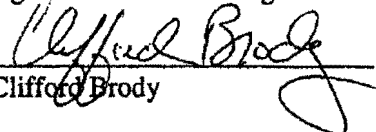
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By: Justin M. Sher
41 Madison Avenue,
41st Floor
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fax: 212-202-4156
justin.sher@sherllp.com
*Attorneys for Defendants
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and David Shapp*

By: Philip L. Hirschhorn
Leslie J. Harris
Tanya D. Bosi
1290 Avenue of the Americas, 30th Floor
New York, New York 10104-3001
Tel.: (212) 440-4400
Fax: (212) 440-4401
philip.hirschhorn@bipc.com
leslie.harris@bipc.com
tanya.bosi@bipc.com

*Attorneys for Plaintiffs Sawabeh Information
Services Company and Edcomm, Inc.*

Agreed and Acknowledged:


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Linda Eagle

David Shapp

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41 Madison Avenue,
41st Floor
New York, NY 10017
Tel: 212-202-2600
Fax: 212-202-4156
justin.sher@sherllp.com
Attorneys for Defendants
Clifford Brady, Linda Eagle
and David Shapp

BUCHANAN INGERSOLL & ROONEY PC

By: Philip L. Hirschhorn
Leslie J. Harris
Tanya D. Bost
1290 Avenue of the Americas, 30th Floor
New York, New York 10104-3001
Tel: (212) 440-4400
Fax: (212) 440-4801
philip.hirschhorn@bupc.com
leslie.harris@bupc.com
tanya.bost@bupc.com

Attorneys for Plaintiff Speech Information
Services Company and Educare, Inc.

Agreed and Acknowledged:

Clifford Brady

Linda Eagle

David Shapp

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41 Madison Avenue,
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New York, NY 10010
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fax: 212-202-4156
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*Attorneys for Defendants
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and David Shapp*

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Leslie J. Harris
Tanya D. Bosi
1290 Avenue of the Americas, 30th Floor
New York, New York 10104-3001
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Fax: (212) 440-4401
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leslie.harris@bipc.com
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